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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,) 2:15-CR-127-MMD-VCF
16 Plaintiff,)
17 v.) **Stipulation to Admit Exhibits 33, 34, 35,
18 TERRY WILLIAMSON,) 36, 37, and 38, Attached to the Motion
19 Defendant.) for Forfeiture, ECF No. 641**

20 The United States of America and Terry Williamson through his counsel, Kathleen
21 Bliss and Jacqueline Tirinnanzi, agree to the following:

22 1. Exhibits 33, 34, 35, 36, 37, and 38 are summaries of JPMorgan Chase bank
23 accounts 5004 and 4197 with forfeiture and restitution filters, not criminal conviction,
24 attached to the United States of America's Motion for Forfeiture ECF No. 641 filed on or
about February 6, 2020, and are admitted as evidence.

25 2. Defense Counsel stipulates only to the numerical terms reflected by the bank
26 record filter, and reserves the right to argue against any additional assertions or conclusions
set forth in the summary charts. Defense Counsel's reservation includes, but is not limited
to, the fact there was no conclusive evidence that the individuals listed in the charts were
responsible for said transaction associated with their name. The government reserves the
right to argue for any additional assertions or conclusions set forth in the summary charts,
including, but is not limited to, the right to prove the individuals listed in the charts were

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1 responsible for the transactions associated with their names. Defendant reserves the
2 argument to counter the government's arguments.

3 3. Each party reserves the right to argue the significance and relevance of the
4 admitted exhibits.

5 4. Each party acknowledges and warrants that its execution of the Stipulation is
6 free and is voluntary.

7 5. The Stipulation contains the entire agreement between the parties.

8 6. Except as expressly stated in the Stipulation, no party, officer, agent,
9 employee, representative, or attorney has made any statement or representation to any other
10 party, person, or entity regarding any fact relied upon in entering into the Stipulation, and
11 no party, officer, agent, employee, representative, or attorney relies on such statement or
12 representation in executing the Stipulation.

13 7. The persons signing the Stipulation warrant and represent that they have full
14 authority to execute the Stipulation and to bind the persons and/or entities, on whose behalf
15 they are signing, to the terms of the Stipulation.

16 8. This Stipulation shall be construed and interpreted according to federal
17 forfeiture law and federal common law and shall not be construed more strictly against one

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1 party than against the other merely by virtue of the fact that it may have been prepared
2 primarily by counsel for one of the parties.

3 DATED: September 25, 2020

4 KATHLEEN BLISS LAW

5 /s/ Kathleen Bliss

6 KATHLEEN BLISS

7 Counsel for Terry Williamson

8 DATED: September 25, 2020

9 KATHLEEN BLISS LAW

10 /s/ Jacqueline Tirinnanzi

11 JACQUELINE TIRINNANZI

DATED: September 25, 2020

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Daniel D. Hollingsworth

DANIEL D. HOLLINGSWORTH

Assistant United States Attorney

13 IT IS SO ORDERED:

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15 UNITED STATES DISTRICT JUDGE

16 DATED: September 28, 2020

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